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August 29, 2019

**Via ECF**

Honorable P. Kevin Castel, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street,  
New York, New York 10007

**Re: Textbroker Int'l, LLC. v. Chloe Skupnick, et al.**  
**Docket No. 19 cv 5608 (PKC)**  
**Initial Pretrial Conf.: 9/23/2019**

Dear Honorable Sir:

Our Firm represents the defendants David Thelin and Nicole Thelin in the above-referenced action. This letter is a formal request for another 14 days to respond to the plaintiff's Complaint. Currently, the defendants must respond to the Complaint by September 3, 2019.

Defendants David Thelin and Nicole Thelin request that their time to answer or make any motion in response to the Complaint be extended to and including September 17, 2019. The Thelin's and plaintiff have been in settlement negotiations for several days. Both sides have been negotiating in good faith. Defendants are requesting the additional time to allow the negotiations to continue and enable the parties to resolve this matter. Plaintiff's counsel has consented to the request for 2-week extension of time to respond to the Complaint. The Court granted defendants' first request for a two-week extension by Order dated August 15, 2019.<sup>1</sup>

In addition, under Judge Castel's Individual Practices, section 1B, it is requested that the initial pretrial conference scheduled for September 23, 2019, be adjourned to a date at least 14 days after the required response date.

For the above reasons, defendants David Thelin and Nicole Thelin respectfully seek an order granting their request to extend their time to respond to the Complaint through September 17, 2019, and an adjournment of the initial conference.

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<sup>1</sup> ECF Doc No. 16.

Thank you for your time and consideration.

Respectfully submitted,



Peter W. Yoars, Jr.

cc: Andrew Solomon, Esq. (ECF only)  
Chloe Skupnick